

EXHIBIT 1

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Interim Lead Class Counsel for Direct Purchaser Plaintiffs

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE CAPACITORS ANTITRUST
LITIGATION

Master File No. 14-cv-03264-JD

THIS DOCUMENT RELATES TO:
ALL DIRECT PURCHASER ACTIONS

**DIRECT PURCHASER PLAINTIFFS'
SECOND SET OF INTERROGATORIES**

III. INTERROGATORIES

INTERROGATORY NO. 10

If You contend that any of Your sales of Capacitors that You manufactured outside the United States to United States purchasers for delivery in the United States do not qualify as “import trade” or “import commerce” pursuant to the terms of the FTAIA, identify those sales or categories of sales and state all facts and legal theories in support of Your contention.

INTERROGATORY NO. 11

If You contend that any of Your sales of Capacitors outside the United States to a foreign subsidiary or foreign agent of a United States company for delivery in the United States do not qualify as “import trade” or “import commerce” pursuant to the terms of the FTAIA, identify those sales or categories of sales and state all facts and legal theories in support of Your contention.

INTERROGATORY NO. 12

If You contend that any of Your sales of Capacitors to purchasers located in the United States for delivery to persons located outside of the United States are outside the scope of coverage of United States antitrust law pursuant to the terms of the FTAIA, whether because they do not qualify as “import trade” or “import commerce” or because they did not have a substantial direct and foreseeable effect on United States commerce or for any other reason, identify those sales or categories of sales and state all facts and legal theories in support of Your contention.

INTERROGATORY NO. 13

If You contend that any of Your sales of Capacitors to persons located outside the United States (including foreign subsidiaries or foreign agents of United States companies) that were delivered to persons located outside the United States for incorporation into products that were sold in the United States are outside the scope of United States antitrust law pursuant to the terms of the FTAIA, whether because they do not qualify as “import trade” or “import commerce” or because they did not have a substantial direct and foreseeable effect on United States commerce or for any other reason, identify those sales and state all facts and legal theories in support of Your contention.

INTERROGATORY NO. 14

If you contend that the FTAIA prevents any Class Member from stating a claim that he, she or it would otherwise be able to state under United States antitrust law with respect to any Capacitors that Class Member purchased, identify each such purchase or category of purchase and state all facts and legal theories in support of your contention.

INTERROGATORY NO. 15

If Your response to any of Direct Purchaser Plaintiffs' Requests for Admissions Nos. 1 through 4 is anything other than an unqualified admission, state your reasons therefor and all bases for your response.

Date: February 25, 2015

JOSEPH SAVERI LAW FIRM, INC.

By: /s/ Joseph R. Saveri
Joseph R. Saveri

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